

IN THE COURT OF COMMON PLEAS  
CLERMONT COUNTY, OHIO  
CIVIL DIVISION

TOTAL QUALITY LOGISTICS, LLC : Case No. 2024 CIV 1774  
: Plaintiff, : JUDGE FERENC  
v. : : MOTION OF PLAINTIFF TOTAL  
THOMAS "CARTER" NEAL, *et al.*, : QUALITY LOGISTICS, LLC FOR  
: EXPEDITED DISCOVERY

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Defendants. :

Pursuant to Civ. R. 26, Plaintiff Total Quality Logistics, LLC ("TQL"), moves for expedited discovery so that the parties can properly prepare for a hearing on TQL's Motion for Preliminary Injunction. Specifically, TQL respectfully requests that the Court order Defendants to provide TQL with complete answers, responses, and documents within ten (10) days of the service (with the Complaint) of TQL's Civ. R. 33, 34, and 36 requests. TQL further asks that the Court order Defendants to produce any party witnesses for a four (4) hour deposition in advance of the preliminary injunction hearing yet to be scheduled. A memorandum in support is attached as well as a Proposed Order (Exhibit A).

Respectfully submitted,

/s/ Scott K. Jones

Scott K. Jones (0069859)

SKJ LAW

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*Counsel for Plaintiff Total Quality Logistics, LLC*

FILED  
2024 DEC 11 AM 10:57

BARBARA A. WIEDENBEIN  
CLERK OF COMMON PLEAS COURT  
CLERMONT COUNTY, OH

**MEMORANDUM IN SUPPORT**

TQL is serving Defendants with discovery under Rules 33, 34, and 36 with the formal service of the Complaint via overnight carrier.

Rules 33, 34, and 36 specifically permit the Court to shorten the length of time within which a party must respond to interrogatories, document requests, and requests for admissions. Here, TQL asks that the Court order the Defendants to respond fully to TQL's Discovery Requests (which are intentionally narrow) within ten (10) days. Expedited responses are needed so that TQL can have the evidence needed to depose the Defendants and properly prepare for the upcoming preliminary injunction hearing. A Proposed Order is attached as Exhibit A.

Respectfully submitted,

/s/ Scott K. Jones  
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*Counsel for Plaintiff Total Quality Logistics, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Motion for Expedited Discovery was served by FedEx via the Clerk's service of the Verified Complaint on the following:

Thomas "Carter" Neal  
2732 Gaston Gate  
Mt. Pleasant, SC 29466

Devine Logistics, Inc.  
1993 NITSA ST  
JOHNS ISLAND, SC 29455-8124

Devine Logistics, Inc.  
C/O Wesley D. Bryant, Ra  
5608 Katy Hill Rd  
Wadmalaw IS, SC 29487

/s/ Scott K. Jones

Scott K. Jones (0069859)